

January 8, 1999

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Room TW-B204  
Washington, D.C. 20554

**RE: In the Matter of**  
  
**The Global Venture of**  
**AT&T Corp. and**  
**British Telecommunications plc,**  
**Et al.**

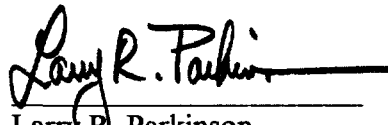
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**IB Docket No. 98-212**

Dear Ms. Roman Salas:

Enclosed for filing please find an original and nine copies of the Federal Bureau of Investigations' Comments to the matter pending before the Commission as captioned above.

Sincerely,



Larry R. Parkinson  
General Counsel  
Room 7435  
FBIHQ  
935 Pennsylvania Ave., N.W.  
Washington, D.C. 20535  
(202) 324-8593

cc: International Bureau (Ms. Regina Keeney)  
International Bureau (Ms. Diane Cornell)  
International Bureau (Mr. Troy Tanner)  
International Bureau (Mr. George Li)  
International Bureau (Ms. Joanna Lowry)  
International Transcription Service, Inc.  
International Reference Room, International Bureau

*Wireless Reference Room, Wireless Bureau*

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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COMMUNICATIONS SECTION  
WASHINGTON, D.C. 20535

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**COMMENTS OF THE FEDERAL BUREAU OF INVESTIGATION**

The FBI respectfully offers the following Comments regarding the captioned matter.

As the Commission is aware, the FBI has a strong interest in telecommunications carrier applicants who seek to offer domestic and international service, owing to the FBI's law enforcement, public safety, and national security obligations. Recognizing that telecommunications service can implicate such matters, certain public notice and review opportunities are statutorily afforded under Sections 214 and 310 of the Communications Act of 1934, 47 U.S.C. §§ 214, 310 (1997), and the Cable Landing License Act, 47 U.S.C. §§ 34-39 (1997), to allow interested parties to offer comment regarding licence applicants.

Since the announcement of the proposed AT&T Corp. and British Telecommunications plc (BT) global joint venture to provide international voice, data, and video communications services to customers throughout the world, AT&T and BT representatives have briefed FBI, Department of Justice (DOJ), and other personnel on the nature of the proposed venture.

From the briefing and subsequent communications, it is clear that AT&T and BT are cognizant of, and appreciate, many of the FBI's aforementioned obligations and concerns.

Further, in these preliminary communications between the FBI and AT&T and BT, it appears

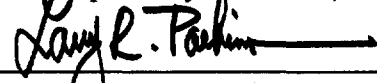
that most, if not all, of the FBI's concerns can be satisfactorily addressed consistent with the AT&T, BT, and joint venture's plans as currently proposed. In this regard, we anticipate that additional meetings will occur in the near future for the purpose of reaching a written agreement that would memorialize those facets of the joint venture plan necessary to satisfy law enforcement, public safety, and national security concerns. We would further envision, subject, of course, to Commission approval, that the salient aspects of such an agreement will be incorporated as "conditions" to the licences and authorizations that AT&T, BT, the joint venture, et al. are seeking in the instant application.

The FBI will keep the Commission apprised of the progress in this matter and will alert it promptly should any substantial impasse develop.

Date: January 8, 1999

Telephone: (202) 324-6829

Respectfully submitted,

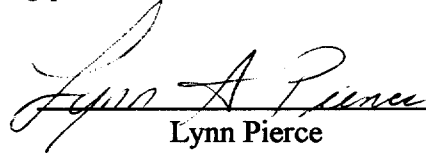
A handwritten signature in black ink, appearing to read "Larry R. Parkinson", is written over a horizontal line.

Larry R. Parkinson  
General Counsel

Federal Bureau of Investigation  
935 Pennsylvania Avenue, N.W.  
Washington, D.C. 20535

### **Certificate of Service**

I, Lynn Pierce, Federal Bureau of Investigation, hereby certify that a copy of the foregoing Comments has been mailed to the following parties:

  
Lynn Pierce

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